



DAVIDOFF HUTCHER & CITRON LLP

ATTORNEYS AT LAW

120 BLOOMINGDALE ROAD
WHITE PLAINS, NEW YORK 10605

TEL: (914) 381-7400

WWW.DHCLLEGAL.COM

FIRM OFFICES

NEW YORK
ATTORNEYS AT LAW
605 THIRD AVENUE
NEW YORK, NY 10158
(212) 557-7200

WEST PALM BEACH
ATTORNEYS AT LAW
1107 NORTH OLIVE AVENUE
WEST PALM BEACH, FL 33401
(561) 567-8488

FIRM OFFICES

WASHINGTON, D.C.
ATTORNEYS AT LAW
201 MASSACHUSETTS AVENUE N.E.
WASHINGTON, D.C. 20002
(202) 347-1117

ALBANY
ATTORNEYS AT LAW
150 STATE STREET
ALBANY, NY 12207
(518) 465-8230

WRITER'S DIRECT: 646-428-3124

E-MAIL: JSP@DHCLLEGAL.COM

December 18, 2024

Via ECF PACER

Hon. Philip Bentley
United States Bankruptcy Court
One Bowling Green
New York, NY 10004
P: (212) 668-2301 | E: pb.chambers@nysb.uscourts.gov

Re: In re Dale D. Goldschlag, No. 24-10297 (PB) (Bankr. S.D.N.Y.)

Dear Honorable Judge:

As you are aware, this Firm represents Dale D. Goldschlag (the “**Debtor**”) in the Chapter 11 bankruptcy matter that was filed and assigned to your honor on February 23, 2024 (Case No. 24-10297) (the “**Chapter 11 Case**”). In accordance with the last hearing, this letter shall confirm that only one creditor has reduced the amount of its claim in the Chapter 11 Case. Specifically, Alliance Funding Group unilaterally amended its Claim No. 16 to lower the amount owed by the Debtor. The voluntary reduction is the result of a recent sale of collateral that lowered the Debtor’s exposure as guarantor. The Debtor therefore believes that a motion pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure is not necessary. If, however, the Court disagrees and would prefer a formal 9019 motion be filed with respect to Claim No. 16, the Debtor will file one with the Court.

Furthermore, the Debtor has now withdrawn all claim objections, including, without limitation, each claim previously expunged by a default order. The Debtor does not anticipate any further amendments of claims and is preparing a Chapter 11 plan and disclosure statement to file with this Court in the near term.

December 18, 2024

Hon. Philip Bentley

Page 2

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Jonathan S. Pasternak

Jonathan S. Pasternak

Attorney for the Debtor